

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

STATE OF WASHINGTON; STATE OF  
ARIZONA; STATE OF ILLINOIS; and  
STATE OF OREGON,

Plaintiffs,

v.

DONALD TRUMP, in his official capacity  
as President of the United States; U.S.  
DEPARTMENT OF HOMELAND  
SECURITY; BENJAMINE HUFFMAN, in  
his official capacity as Acting Secretary of  
Homeland Security; U.S. SOCIAL  
SECURITY ADMINISTRATION;  
MICHELLE KING, in her official capacity  
as Acting Commissioner of the Social  
Security Administration; U.S.  
DEPARTMENT OF STATE; MARCO  
RUBIO, in his official capacity as Secretary  
of State; U.S. DEPARTMENT OF  
HEALTH AND HUMAN SERVICES;  
DOROTHY FINK, in her official capacity  
as Acting Secretary of Health and Human  
Services; U.S. DEPARTMENT OF  
JUSTICE; JAMES MCHENRY, in his  
official capacity as Acting Attorney  
General; U.S. DEPARTMENT OF  
AGRICULTURE, GARY WASHINGTON,  
in his official capacity as Acting Secretary  
of Agriculture; and the UNITED STATES  
OF AMERICA,

Defendants.

NO. 2:25-cv-00127

DECLARATION OF  
MAGALY SOLIS CHAVEZ

1 I, Magaly Solis Chavez, declare as follows:

2 1. I am over the age of 18, competent to testify as to the matters herein, and make  
3 this declaration based on my personal and professional knowledge.

4 2. I am the Executive Director of La Casa Hogar, a non-profit community-based  
5 organization in Yakima, Washington. Prior to becoming the Director in 2021, I was the  
6 organization's citizenship program manager for seven years. For over 30 years, La Casa Hogar  
7 has provided community services and education to Latina families in the Yakima Valley. In  
8 Yakima County, Latinos make up over 50% of the population, and in the Yakima School District  
9 82% of the student population is Latino.

10 3. La Casa Hogar's core programs include adult education, early learning, and  
11 citizenship education and legal services for individuals and families across Central Washington.  
12 We offer adult education including English classes, pre-GED, English-Spanish Language  
13 Exchange, and leadership development. Our Early Learning Center prepares children ages three  
14 to five to enter kindergarten and includes parent support classes. Annually La Casa Hogar serves  
15 over 1,000 individuals with educational opportunities across all three programs. We also provide  
16 referrals to over 4,500 community members annually seeking resources.

17 4. In my seven years as the program manager at La Casa Hogar's citizenship  
18 program, I taught classes to prepare community members applying for citizenship. During my  
19 tenure as program manager, over 1000 people successfully naturalized and became US citizens  
20 because of their eligibility to apply for citizenship under immigration laws, as well as  
21 determination and commitment; the expertise of our team of staff and immigration attorney  
22 volunteers and board members makes this possible. Currently, approximately 500 adult  
23 immigrant students enroll in our citizenship classes. We are a Department of Justice-recognized  
24 organization and assist these students to apply for naturalization. Since 2014, over 2,300  
25 immigrants have become U.S. citizens through our program. In working with citizenship  
26 students for ten years now, I have witnessed that obtaining citizenship offers stability particularly

1 by providing access to employment, economic, and housing opportunities. One of the biggest  
2 changes I have observed is an increased feeling of safety and sense of belonging for people who  
3 have lived in and contributed to the United States. This increased safety and stability for the  
4 persons who are eligible to apply and are granted citizenship creates security and peace of mind  
5 for their children and families as well, allowing families to no longer fear potential separation. I  
6 have observed that when people become citizens, they quickly and eagerly register to vote,  
7 participate in elections, and engage in local civic issues as the active community members they  
8 are.

9 5. La Casa Hogar invests in education for Latina families because we know that  
10 equipping immigrant children and adults to participate fully in the community of the Yakima  
11 Valley leads to a healthier and thriving community for everyone.

12 6. I am aware that President Trump has issued an Executive Order attempting to  
13 deny birthright citizenship to children of immigrant parents. This fulfills promises he made  
14 throughout his campaign to end birthright citizenship for children of undocumented parents. The  
15 news of this expected change in federal law and policy has caused uncertainty and fear in the  
16 community La Casa Hogar serves, and among other supporters who are not immigrants. I and  
17 my staff have directly listened to families we work with express the following concerns.

18 7. Parents are concerned that if their children are stripped of citizenship, they will  
19 face the same challenges in life that they as parents have already experienced living  
20 undocumented in this country. These challenges include (but are not limited to) accessing  
21 education, services like basic healthcare, and difficulty building credit, which in turn, create  
22 barriers to obtaining both critical needs like a job, to even simple things like getting a cell phone  
23 plan. Parents are thinking about all the challenges they have had to navigate, and how their  
24 children will now have to navigate those same challenges and live in constant fear of potential  
25 familial separation.  
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1           8.       Parents are worried about how education and employment opportunities will be  
2 reduced for Latino children being born in the U.S., reducing economic mobility.

3           9.       Families are worried about their ability to travel anywhere outside the state.

4           10.      The community is concerned about the ability to have a healthy life because they  
5 fear they will not have access to needed services and benefits, including medical care.

6           11.      Many of the individuals La Casa Hogar works with have lived in the United States  
7 since they were young children. They do not have a home country to return to; the United States  
8 is the only home they know. Other individuals we work with are unable to return to their country  
9 of origin because of violence or persecution. Many of these individuals now have their own  
10 children and are raising their families. If their children born here are denied citizenship, the  
11 family will live in limbo, forced to raise their children without stability and the ability to fully  
12 participate in their new home; forced to raise their children in fear and instability.

13          12.      The community and staff at La Casa Hogar are concerned about how stripping  
14 citizenship from children will increase young people's feeling of a lack of belonging. Changes  
15 in immigration law that deprive children of protection and citizenship create fear. Fear drives  
16 young people to distance themselves from their family, culture, and language because being  
17 identified as an immigrant or associated with their family creates greater risk of deportation or  
18 other harms. Without lawful status, they likewise cannot experience full belonging in U.S.  
19 culture and communities. Our organization's vision is to cultivate connected community, and  
20 this change in federal law undermines people's ability to integrate with and contribute to their  
21 community.

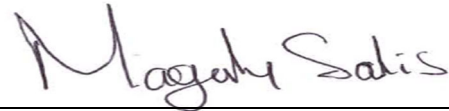
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1 I declare under penalty of perjury under the laws of the State of Washington and the  
2 United States of America that the foregoing is true and correct.

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4 DATED and SIGNED this 20th day of January 2025, at Yakima, Washington.

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8 Magaly Solis Chavez  
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